

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

COMPLETE FITNESS RHB LLC  
AND NERVEANA LLC, (Daniel  
Gordon Jr.),  
Plaintiff,

Case No. 25-cv-10657  
District Court Judge  
Magistrate Judge

v.

COMMONWEALTH CASUALTY  
COMPANY,  
Defendant.

---

James W. Low, P63110  
Michael Fergestrom, P48864  
Jordan E. Dollar, P75674  
The Dollar Law Firm PLLC  
220 S. Main St., Ste. 126  
Royal Oak, MI 48067  
Phone: (248) 918-4500, Fax: (248)  
809-4000  
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[mfergestrom@lawdollar.com](mailto:mfergestrom@lawdollar.com)  
*Attorneys for Plaintiffs*

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*Attorneys for Commonwealth Casualty  
Company*

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**CIVIL COVER SHEET**

**NOTICE OF REMOVAL OF CAUSE TO THE UNITED STATES  
DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN,  
SOUTHERN DIVISION**

**NOTICE OF FILING OF REMOVAL**

**CERTIFICATE OF SERVICE**

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Date: March 7, 2025

Respectfully submitted,

*/s/ Julia T. Stuebing*

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Company*



PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

Yes  
 No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

Yes  
 No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

Notes :

\_\_\_\_\_

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

COMPLETE FITNESS RHB LLC  
AND NERVEANA LLC, (Daniel  
Gordon Jr.),  
Plaintiff,

Case No. 25-cv-10657  
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v.

COMMONWEALTH CASUALTY  
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*Attorneys for Plaintiffs*

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*Attorneys for Commonwealth Casualty  
Company*

---

**NOTICE OF REMOVAL OF CAUSE TO THE UNITED STATES  
DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN,  
SOUTHERN DIVISION**

---

Defendant Commonwealth Casualty Company (“Defendant” or “Commonwealth”),<sup>1</sup> by and through its undersigned counsel, gives notice of removal of this action to this Court pursuant to 28 U.S.C. §§ 1332 and 1441, and respectfully states as follows:

1. On or about January 30, 2025, Plaintiff “Complete Fitness RHB LLC, (Daniel Gordon Jr.)” commenced this action, which is now pending in Wayne County Circuit Court, Michigan, case no. 25-001451-NF. That same day, a First Amended Complaint was filed, with the Plaintiffs styled as “Complete Fitness RHB LLC and Nerveana LLC, (Daniel Gordon Jr.)”.
2. The First Amended Complaint and what appears to be a partial copy of the initial Complaint was served on Commonwealth Casualty Company (“Casualty” or “Defendant”) on February 7, 2025. A copy of all process, pleadings and orders served on Commonwealth are attached hereto as **Exhibit 1**.
3. Removal is proper under 28 U.S.C. § 1441 because the Court has original subject matter jurisdiction over this action.

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<sup>1</sup> Commonwealth objects to personal jurisdiction and reserves the right to file a motion to dismiss for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2). Commonwealth further reserves the right to file a motion to dismiss for failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6).

4. This Court has original jurisdiction because (a) it is a civil action between citizens of different states and (b) the amount-in-controversy requirements are satisfied. *See* 28 U.S.C. § 1332(a).
5. With respect to diversity, on information and belief Plaintiff Complete Fitness RHB LLC is a limited liability company organized under the laws of the state of Michigan, and its member is Youssef Barki who is a citizen of Michigan.
6. On information and belief Plaintiff Nerveana LLC is an limited liability company organized under the laws of the state of Michigan, and its member is Khalil Moussa who is a citizen of Michigan.
7. Defendant Commonwealth is a foreign corporation. Commonwealth was, at the time of the commencement of this action, and has been since that time, a corporation organized and existing under the laws of Arizona with its principal place of business in Arizona. Therefore, for purposes of diversity of citizenship, Commonwealth was and is a citizen of Arizona and was not and is not a citizen of Michigan.
8. There is complete diversity between Plaintiffs and Defendant. This action may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441 because

Commonwealth is not a citizen of the State of Michigan, and Plaintiffs are not citizens of Arizona.<sup>2</sup>

9. Further, the amount in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs. In the First Amended Complaint, Plaintiff alleges damages as follows:

3. That the amount in controversy is within the jurisdiction of this Court by reason of a claim of damages, excluding statutory penalty interest and attorney fees is \$92,030.00  
**[EXHIBIT 1].**

First Amended Complaint at para 3.

10. A cause of action may be removed where the defendant establishes by a preponderance of the evidence that the amount in controversy exceeds \$75,000.00. *Hayes v. Equitable Energy Resources Co.*, 266 F.3d 560, 572 (6th Cir. 2001).

11. Accordingly, the amount in controversy requirement of 28 U.S.C. § 1332(a)(1) has been met.

12. Removal of this action is timely. Pursuant to 28 U.S.C. § 1446(b), removal must be filed within 30 days after the receipt by the defendant of the initial pleading. This Notice is filed on March 7, 2025, within 30 days of receipt of

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<sup>2</sup> Moreover, upon information and belief, Daniel Gordon Jr. is a citizen of Michigan. *See* First Amended Complaint at Exhibit 1.

Plaintiff's partial Complaint and First Amended Complaint on February 7, 2025.

13. The United States District Court for the Eastern District of Michigan, Southern Division, is the proper venue for this action under 28 U.S.C. § 1441(a) because it presides over the county within which the Complaint was filed, which is Wayne County, Michigan.

14. Pursuant to 28 U.S.C. § 1446(d), a copy of the initial Notice of Removal, as well as a Notice of Filing of the Notice of Removal, was filed with Wayne County Circuit Court, Michigan, and a copy of the same was served upon all parties. A copy of this filing is attached hereto.

15. Commonwealth reserves the right to amend or supplement this Notice of Removal or to present additional arguments in support of its entitlement to remove this case.

16. Commonwealth reserves all defenses and objections, including, without limitation, the defenses of insufficiency of process, insufficiency of service of process, lack of personal jurisdiction, and any other defenses or objections available under applicable law, and the filing of this Notice of Removal is subject to, and without waiver of, any such defenses or objections.

WHEREFORE, Defendant Commonwealth Casualty Company respectfully requests removal of this action from Wayne County Circuit Court, Michigan to this Court for all other appropriate proceedings.

Date: March 7, 2025

Respectfully submitted,

*/s/ Julia T. Stuebing*

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Phone: (734) 773-4051, Fax: (734) 913-6007  
*julia.stuebing@dinsmore.com*  
*Attorneys for Commonwealth Casualty Company*

STATE OF MICHIGAN  
WAYNE COUNTY CIRCUIT COURT

COMPLETE FITNESS RHB LLC  
AND NERVEANA LLC, (Daniel  
Gordon Jr.),  
Plaintiff,

Case No. 25-001451-NF  
Hon. Leslie Kim Smith

v.

COMMONWEALTH CASUALTY  
COMPANY,  
Defendant.

---

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Michael Fergestrom, P48864  
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*Attorneys for Plaintiffs*

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*Attorneys for Commonwealth Casualty  
Company*

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**NOTICE OF FILING OF REMOVAL**

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To: Clerk of the Court, Wayne County Circuit Court

PLEASE TAKE NOTICE THAT Defendant Commonwealth Casualty  
Company filed today its Notice of Removal, a copy of which is attached hereto, in  
the offices of the Clerk of the United States District Court, Eastern District of

Michigan, Southern Division, Theodore Levin U.S. Courthouse, 231 W. Lafayette Blvd., Room 599, Detroit, MI 48226.

Date: March 7, 2025

Respectfully submitted,

*/s/ Julia T. Stuebing*

---

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*julia.stuebing@dinsmore.com*  
*Attorneys for Commonwealth Casualty Company*

**PROOF OF SERVICE**

I hereby certify that the foregoing was served on counsel of record MiFile/TrueFiling on March 7, 2025. I declare the foregoing is true to the best of my information, knowledge, and belief.

Date: March 7, 2025

*/s/ Julia T. Stuebing*

---

Julia T. Stuebing

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

COMPLETE FITNESS RHB LLC  
AND NERVEANA LLC, (Daniel  
Gordon Jr.),  
Plaintiff,

v.

COMMONWEALTH CASUALTY  
COMPANY,  
Defendant.

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[jdollar@lawdollar.com](mailto:jdollar@lawdollar.com)  
[mfergestrom@lawdollar.com](mailto:mfergestrom@lawdollar.com)  
*Attorneys for Plaintiffs*

Case No.  
District Court Judge  
Magistrate Judge

Julia T. Stuebing, P81227  
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6007  
[julia.stuebing@dinsmore.com](mailto:julia.stuebing@dinsmore.com)  
*Attorneys for Commonwealth Casualty  
Company*

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**CERTIFICATE OF SERVICE**

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I hereby certify that on March 7, 2025, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, and served the same to the following by e-mail and U.S. Mail on:

James W. Low, P63110  
Michael Fergestrom, P48864

Jordan E. Dollar, P75674  
The Dollar Law Firm PLLC  
220 S. Main St., Ste. 126  
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Phone: (248) 918-4500, Fax: (248) 809-4000

[james.low@lawdollar.com](mailto:james.low@lawdollar.com) [jdollar@lawdollar.com](mailto:jdollar@lawdollar.com)  
[mfergestrom@lawdollar.com](mailto:mfergestrom@lawdollar.com)

*Attorneys for Plaintiffs*

I declare the foregoing is true to the best of my information, knowledge, and belief.

Date: March 7, 2025

Respectfully submitted,

*/s/ Julia T. Stuebing*

---

Julia T. Stuebing, P81227  
Dinsmore & Shohl LLP  
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*Attorneys for Commonwealth Casualty Company*

# Exhibit 1



**CERTIFIED MAIL**

\$16.960  
US POSTAGE IMI  
PRIORITY MAIL  
COMMERCIAL  
FROM 48120  
02/03/2025  
 Stamps  
06350014950534



9402 7112 0620 6462 4932 80

Commonwealth Casualty Company  
Attn: Inessa Hakobyan  
2500 N 24th St  
Phoenix AZ 85008-1842

RECEIVED  
FEB 07 2025

STATE OF MICHIGAN THIRD JUDICIAL CIRCUIT WAYNE COUNTY	SUMMONS	CASE NO. 25-001451-NF Hon. Leslie Kim Smith
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Court telephone no.: 313-224-2427

Plaintiff's name(s), address(es), and telephone no(s) Complete Fitness RHB LLC (Daniel Gordon Jr.)	v	Defendant's name(s), address(es), and telephone no(s). Commonwealth Casualty Company
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RECEIVED

FEB 07 2025

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

#### Domestic Relations Case

- There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

#### Civil Case

- This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035
- MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in  this court,  \_\_\_\_\_ Court, where it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.

The action  remains  is no longer pending.

Summons section completed by court clerk.

SUMMONS

#### NOTICE TO THE DEFENDANT:

In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 1/30/2025	Expiration date* 5/1/2025	Court clerk Jacqueline Ruff
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Cathy M. Garrett- Wayne County Clerk.

\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

MC 01 (3/23)

SUMMONS

MCR 1.109(D), MCR 2.102(B), MCR 2.103, MCR 2.104, MCR 2.105



25-001451-NF FILED IN MY OFFICE Cathy M. Garrett Wayne County Clerk Jacqueline Ruff

THE DOLLAR LAW FIRM, PLLC  
Attorneys at Law  
220 South Main Street  
SUITE 126  
Royal Oak, Michigan 48067  
(248) 918-4500

STATE OF MICHIGAN  
IN THE WAYNE COUNTY THIRD CIRCUIT COURT

COMPLETE FITNESS RHB LLC,  
(Daniel Gordon Jr.)

Case No. 25-  
Hon. -NF

Plaintiff,

vs.

COMMONWEALTH CASUALTY COMPANY,

Defendant.

\_\_\_\_\_  
JAMES W. LOW (P63110)  
MICHAEL FERGESTROM (P48864)  
JORDAN E. DOLLAR (P75674)  
**The Dollar Law Firm PLLC**  
Attorney for Plaintiff  
220 S. Main St., Suite 126  
Royal Oak, MI 48067  
(248) 918-4500 / (248) 809-4000 (fax)  
\_\_\_\_\_

There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this Complaint pending in this Court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge. MCR 2.113(C)(2)(b).

\_\_\_\_\_  
/s/ James W. Low

James W. Low (P63110)

**COMPLAINT**

7. That Daniel Gordon Jr. was involved in a motor vehicle accident.
8. That as a result of the afore-described accident, Plaintiff has incurred medical expenses regarding the care, recovery, and rehabilitation of Daniel Gordon Jr..
9. That Defendant is in first priority for payment of No-Fault benefits on behalf of Daniel Gordon Jr. pursuant to MCL 500.3114.
10. That reasonable proof for full payment of personal insurance benefits has been or will be supplied by Plaintiff to Defendant.
11. That Defendant is responsible for payment of the medical expenses incurred by Daniel Gordon Jr. as a result of the accident.
12. That Defendant denied payment of the medical expenses incurred by Daniel Gordon Jr. as a result of the accident.
13. That Defendant is in breach of its contractual obligation to make payment of the medical expenses incurred by Plaintiff.

**COUNT II – VIOLATION OF MICHIGAN NO-FAULT STATUTE –**  
**DEFENDANT Commonwealth Casualty Company (VIA ASSIGNMENT)**

14. Plaintiff repeats and incorporates all preceding paragraphs as though more fully set forth herein.
15. Regarding the services performed by the Plaintiff for Daniel Gordon Jr. that are at issue, the Plaintiff's charges for those services, and any actual or potential insurance coverage or benefits under any insurance policy or under the Michigan No-Fault Insurance Act with respect to those services and charges (including but not limited to Personal Injury Protection benefits), Daniel Gordon Jr. has assigned his or her rights, benefits, claims, and causes of action to the Plaintiff.

THE DOLLAR LAW FIRM, PLLC  
Attorneys at Law  
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SUITE 126  
Royal Oak, Michigan 48067  
(248) 918-4500

220 S. Main St., Suite 126  
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January 30, 2025

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THE DOLLAR LAW FIRM, PLLC  
Attorneys at Law  
4000 Town Center  
SUITE 480  
Southfield, Michigan 48075  
(248) 918-4500

## COMPLETE FITNESS RHB LLC

**Patient Ledger**

Sorted By: Case Number

Entry	Date	POS	Description	Case	Procedure	Document	Provider	Amount
46496	2/6/2024	11		385	97530	2402060000	AR	90.00
46497	2/6/2024	11		385	97039	2402060000	AR	5900.00
46872	2/8/2024	11		385	G0283	2402080000	AR	60.00
46873	2/8/2024	11		385	97110	2402080000	AR	90.00
46874	2/8/2024	11		385	97140	2402080000	AR	75.00
46875	2/8/2024	11		385	97112	2402080000	AR	65.00
46876	2/8/2024	11		385	97530	2402080000	AR	90.00
46877	2/8/2024	11		385	97039	2402080000	AR	5900.00
47397	2/13/2024	11		385	G0283	2402120000	AR	60.00
47398	2/13/2024	11		385	97110	2402120000	AR	90.00
47399	2/13/2024	11		385	97140	2402120000	AR	75.00
47400	2/13/2024	11		385	97112	2402120000	AR	65.00
47401	2/13/2024	11		385	97530	2402120000	AR	90.00
47402	2/13/2024	11		385	97039	2402120000	AR	5900.00
47910	2/15/2024	11		385	G0283	2402150000	AR	60.00
47911	2/15/2024	11		385	97110	2402150000	AR	90.00
47912	2/15/2024	11		385	97112	2402150000	AR	65.00
47913	2/15/2024	11		385	97140	2402150000	AR	75.00
47914	2/15/2024	11		385	97164	2402150000	AR	195.00
48361	2/20/2024	11		385	G0283	2402200000	AR	60.00
48362	2/20/2024	11		385	97035	2402200000	AR	70.00
48363	2/20/2024	11		385	97110	2402200000	AR	90.00
48364	2/20/2024	11		385	97140	2402200000	AR	75.00
48365	2/20/2024	11		385	97112	2402200000	AR	65.00
48366	2/20/2024	11		385	97530	2402200000	AR	90.00
48730	2/22/2024	11		385	G0283	2402220000	AR	60.00
48731	2/22/2024	11		385	97035	2402220000	AR	70.00
48732	2/22/2024	11		385	97110	2402220000	AR	90.00
48733	2/22/2024	11		385	97140	2402220000	AR	75.00
48734	2/22/2024	11		385	97112	2402220000	AR	65.00
48735	2/22/2024	11		385	97530	2402220000	AR	90.00
49336	2/27/2024	11		385	G0283	2402270000	AR	60.00
49337	2/27/2024	11		385	97110	2402270000	AR	90.00
49338	2/27/2024	11		385	97140	2402270000	AR	75.00
49339	2/27/2024	11		385	97112	2402270000	AR	65.00
49340	2/27/2024	11		385	97530	2402270000	AR	90.00
49341	2/27/2024	11		385	97039	2402270000	AR	5900.00
49822	3/1/2024	11		385	G0283	2403010000	AR	60.00
49823	3/1/2024	11		385	97035	2403010000	AR	70.00
49824	3/1/2024	11		385	97110	2403010000	AR	90.00
49825	3/1/2024	11		385	97140	2403010000	AR	75.00
49826	3/1/2024	11		385	97112	2403010000	AR	65.00
49827	3/1/2024	11		385	97530	2403010000	AR	90.00
50160	3/5/2024	11		385	G0283	2403050000	AR	60.00
50161	3/5/2024	11		385	97110	2403050000	AR	90.00
50162	3/5/2024	11		385	97140	2403050000	AR	75.00
50163	3/5/2024	11		385	97112	2403050000	AR	65.00

## COMPLETE FITNESS RHB LLC

**Patient Ledger**

Sorted By: Case Number

Entry	Date	POS	Description	Case	Procedure	Document	Provider	Amount
54839	4/15/2024	11		385	97035	2404150000	AR	70.00
54840	4/15/2024	11		385	97110	2404150000	AR	90.00
54841	4/15/2024	11		385	97140	2404150000	AR	75.00
54842	4/15/2024	11		385	97112	2404150000	AR	65.00
54843	4/15/2024	11		385	97530	2404150000	AR	90.00
54844	4/15/2024	11		385	97039	2404150000	AR	5900.00
55866	4/22/2024	11		385	G0283	2404290000	AR	60.00
55867	4/22/2024	11		385	97035	2404290000	AR	70.00
55868	4/22/2024	11		385	97110	2404290000	AR	90.00
55869	4/22/2024	11		385	97140	2404290000	AR	75.00
55870	4/22/2024	11		385	97112	2404290000	AR	65.00
55871	4/22/2024	11		385	97530	2404290000	AR	90.00
56078	4/29/2024	11		385	G0283	2404290000	AR	60.00
56079	4/29/2024	11		385	97035	2404290000	AR	70.00
56080	4/29/2024	11		385	97110	2404290000	AR	90.00
56081	4/29/2024	11		385	97140	2404290000	AR	75.00
56082	4/29/2024	11		385	97112	2404290000	AR	65.00
56083	4/29/2024	11		385	97530	2404290000	AR	90.00
57084	5/3/2024	11		385	G0283	2405030000	AR	60.00
57085	5/3/2024	11		385	97110	2405030000	AR	90.00
57086	5/3/2024	11		385	97140	2405030000	AR	75.00
57087	5/3/2024	11		385	97112	2405030000	AR	65.00
57088	5/3/2024	11		385	97530	2405030000	AR	90.00
57269	5/6/2024	11		385	G0283	2405060000	AR	60.00
57270	5/6/2024	11		385	97110	2405060000	AR	90.00
57271	5/6/2024	11		385	97140	2405060000	AR	75.00
57272	5/6/2024	11		385	97112	2405060000	AR	65.00
57273	5/6/2024	11		385	97530	2405060000	AR	90.00
58699	5/17/2024	11		385	G0283	2405170000	AR	60.00
58700	5/17/2024	11		385	97110	2405170000	AR	90.00
58701	5/17/2024	11		385	97140	2405170000	AR	75.00
58702	5/17/2024	11		385	97112	2405170000	AR	65.00
58703	5/17/2024	11		385	97530	2405170000	AR	90.00
60270	5/31/2024	11		385	G0283	2405300000	AR	60.00
60271	5/31/2024	11		385	97110	2405300000	AR	90.00
60272	5/31/2024	11		385	97140	2405300000	AR	75.00
60273	5/31/2024	11		385	97112	2405300000	AR	65.00
61160	6/10/2024	11		385	G0283	2406100000	AR	60.00
61161	6/10/2024	11		385	97110	2406100000	AR	90.00
61162	6/10/2024	11		385	97140	2406100000	AR	75.00
61163	6/10/2024	11		385	97112	2406100000	AR	65.00
63155	7/1/2024	11		385	G0283	2406280000	AR	60.00
63156	7/1/2024	11		385	97110	2406280000	AR	90.00
63157	7/1/2024	11		385	97140	2406280000	AR	75.00
63158	7/1/2024	11		385	97112	2406280000	AR	65.00
63590	7/5/2024	11		385	G0283	2407050000	AR	60.00
63591	7/5/2024	11		385	97110	2407050000	AR	90.00

STATE OF MICHIGAN THIRD JUDICIAL CIRCUIT WAYNE COUNTY	SUMMONS	CASE NO. 25-001451-NF Hon. Leslie Kim Smith
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Court telephone no.: 313-224-2427

Plaintiff's name(s), address(es), and telephone no(s) Complete Fitness RHB LLC (Daniel Gordon Jr.)
Plaintiff's attorney, bar no., address, and telephone no Jordan E. Dollar 75674 220 S Main St Ste 126 Royal Oak, MI 48067-2678

v

Defendant's name(s), address(es), and telephone no(s). Commonwealth Casualty Company
---

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

#### Domestic Relations Case

- There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

#### Civil Case

- This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035
- MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in  this court,  \_\_\_\_\_ Court, where it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.

The action  remains  is no longer pending.

Summons section completed by court clerk.

SUMMONS

#### NOTICE TO THE DEFENDANT:

In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 1/30/2025	Expiration date* 5/1/2025	Court clerk Jacqueline Ruff
-------------------------	------------------------------	--------------------------------

Cathy M. Garrett- Wayne County Clerk.

\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

MC 01 (3/23)

SUMMONS

MCR 1.109(D), MCR 2.102(B), MCR 2.103, MCR 2.104, MCR 2.105



STATE OF MICHIGAN

IN THE WAYNE COUNTY THIRD CIRCUIT COURT

COMPLETE FITNESS RHB LLC AND  
NERVEANA LLC,  
(Daniel Gordon Jr.)

Case No. 25-001451-NF  
Hon. Leslie Kim Smith

Plaintiff,

vs.

COMMONWEALTH CASUALTY COMPANY,

Defendant.

\_\_\_\_\_  
JAMES W. LOW (P63110)  
MICHAEL FERGESTROM (P48864)  
JORDAN E. DOLLAR (P75674)  
**The Dollar Law Firm PLLC**  
Attorney for Plaintiff  
220 S. Main St., Suite 126  
Royal Oak, MI 48067  
(248) 918-4500 / (248) 809-4000 (fax)

\_\_\_\_\_  
/

There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this Complaint pending in this Court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge. MCR 2.113(C)(2)(b).

\_\_\_\_\_  
/s/ James W. Low

\_\_\_\_\_  
James W. Low (P63110)

**FIRST AMENDED**  
**COMPLAINT**

NOW COMES Plaintiff, COMPLETE FITNESS RHB LLC AND NERVEANA LLC, by and through its attorneys JAMES W. LOW and THE DOLLAR LAW FIRM, PLLC, and for its Complaint, state as follows:

**COUNT I – BREACH OF CONTRACT – DEFENDANT Commonwealth Casualty Company (VIA ASSIGNMENT)**

1. That Plaintiff COMPLETE FITNESS RHB LLC AND NERVEANA LLC is a medical provider with its principal place of business in the City of Southfield, County of Oakland, State of Michigan.
2. That Defendant Commonwealth Casualty Company conducts a regular and systematic part of its business in the County of Wayne in the State of Michigan.
3. That the amount in controversy is within the jurisdiction of this Court by reason of a claim of damages, excluding statutory penalty interest and attorney fees is \$92,030.00 [EXHIBIT 1].
4. That Defendant Daniel Gordon Jr. was involved in a motor vehicle accident.
5. That as a result of the afore-described accident, Plaintiff has incurred medical expenses regarding the care, recovery, and rehabilitation of Daniel Gordon Jr..
6. Regarding the services performed by the Plaintiff for Daniel Gordon Jr. that are at issue, the Plaintiff's charges for those services, and any actual or potential insurance coverage or benefits under any insurance policy or under the Michigan No-Fault Insurance Act with respect to those services and charges (including but not limited to Personal Injury Protection benefits), Daniel Gordon Jr. has assigned his or her rights, benefits, claims, and causes of action to the Plaintiff.

THE DOLLAR LAW FIRM, PLLC  
Attorneys at Law  
220 South Main Street  
SUITE 126  
Royal Oak, Michigan 48067  
\_\_\_\_\_  
(248) 918-4500

7. That Daniel Gordon Jr. was involved in a motor vehicle accident.
8. That as a result of the afore-described accident, Plaintiff has incurred medical expenses regarding the care, recovery, and rehabilitation of Daniel Gordon Jr..
9. That Defendant is in first priority for payment of No-Fault benefits on behalf of Daniel Gordon Jr. pursuant to MCL 500.3114.
10. That reasonable proof for full payment of personal insurance benefits has been or will be supplied by Plaintiff to Defendant.
11. That Defendant is responsible for payment of the medical expenses incurred by Daniel Gordon Jr. as a result of the accident.
12. That Defendant denied payment of the medical expenses incurred by Daniel Gordon Jr. as a result of the accident.
13. That Defendant is in breach of its contractual obligation to make payment of the medical expenses incurred by Plaintiff.

**COUNT II – VIOLATION OF MICHIGAN NO-FAULT STATUTE –**  
**DEFENDANT Commonwealth Casualty Company (VIA ASSIGNMENT)**

14. Plaintiff repeats and incorporates all preceding paragraphs as though more fully set forth herein.
15. Regarding the services performed by the Plaintiff for Daniel Gordon Jr. that are at issue, the Plaintiff's charges for those services, and any actual or potential insurance coverage or benefits under any insurance policy or under the Michigan No-Fault Insurance Act with respect to those services and charges (including but not limited to Personal Injury Protection benefits), Daniel Gordon Jr. has assigned his or her rights, benefits, claims, and causes of action to the Plaintiff.

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Attorneys at Law  
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Royal Oak, Michigan 48067  
\_\_\_\_\_  
(248) 918-4500

16. That Defendant is in breach of its statutory obligation to make payment of the medical expenses incurred by Plaintiff.

**COUNT III – VIOLATION OF MICHIGAN NO-FAULT STATUTE –**

**DEFENDANT Commonwealth Casualty Company (STATUTORY CAUSE OF ACTION)**

17. Plaintiff repeats and incorporates all preceding paragraphs as though more fully set forth herein.

18. Under MCL 500.3112, “A health care provider listed in section 3157 may make a claim and assert a direct cause of action against an insurer, or under the assigned claims plan under sections 3171 to 3175, to recover overdue benefits payable for charges for products, services, or accommodations provided to an injured person.”

19. Defendant has not paid for Plaintiff’s services and the outstanding billing is overdue.

20. That Defendant is in breach of its statutory obligation to make payment of the medical expenses incurred by Plaintiff.

THE DOLLAR LAW FIRM, PLLC  
Attorneys at Law  
220 South Main Street  
SUITE 126  
Royal Oak, Michigan 48067  
\_\_\_\_\_  
(248) 918-4500

WHEREFORE, Plaintiff COMPLETE FITNESS RHB LLC AND NERVEANA LLC, seeks damages in an amount in excess of \$25,000.00 in addition to the attorney fees and interest pursuant to MCL 500.3148 and MCL 500.3142.

/s/ James W. Low

JORDAN E. DOLLAR (P75674)  
JAMES W. LOW (P63110)  
**The Dollar Law Firm PLLC**  
Attorneys for Plaintiff

220 S. Main St., Suite 126  
Royal Oak, MI 48067

January 30, 2025

THE DOLLAR LAW FIRM, PLLC  
Attorneys at Law  
220 South Main Street  
SUITE 126  
Royal Oak, Michigan 48067  
\_\_\_\_\_  
(248) 918-4500

# EXHIBIT 1

THE DOLLAR LAW FIRM, PLLC  
Attorneys at Law  
220 South Main Street  
SUITE 126  
Royal Oak, Michigan 48067  
(248) 918-4500

THE DOLLAR LAW FIRM, PLLC  
Attorneys at Law  
4000 Town Center  
Suite 480  
Southfield, Michigan 48075  
(248) 918-4500

**NERVEANA LLC**

24133 W 10 MILE RD  
SOUTHFIELD, MI 48033  
(248)327-7089

Page: 1

1/30/2025

**Patient:** DANIEL GORDON  
30591 CONCORD CT  
ROSEVILLE, MI 48066

**Chart #:** GORDA000**Case #:** 1215**Instructions:**

Complete the patient information portion of your insurance claim form. Attach this bill, signed and dated, and all other bills pertaining to the claim. If you have a deductible policy, hold your claim forms until you have met your deductible. Mail directly to your insurance carrier.

Date	Description	Procedure	Modifier	Dx 1	Dx 2	Dx 3	Dx 4	Units	Charge
1/3/2024	LUMBER-SECRAL ORTHOSIS	L0637		S13.4XXA	S23.3XXA	S33.5XXA	M54.2	1	1,500.00
1/3/2024	CERVICAL PILLOW	E0190		S13.4XXA	S23.3XXA	S33.5XXA	M54.2	1	150.00
1/3/2024	HEATING PAD ELECT MOIST/DRY	E0215		S13.4XXA	S23.3XXA	S33.5XXA	M54.2	1	250.00
1/3/2024	Education And Training For Patient	98960		S13.4XXA	S23.3XXA	S33.5XXA	M54.2	1	400.00
1/3/2024	Dme delivery, set up, and/or	A9901		S13.4XXA	S23.3XXA	S33.5XXA	M54.2	1	350.00
4/30/2024	INF UNIT DIGITAL	E1399		S13.4XXA	S23.3XXA	S33.5XXA		1	2,200.00
4/30/2024	Education And Training For Patient	98960		S13.4XXA	S23.3XXA	S33.5XXA		1	400.00
4/30/2024	Dme delivery, set up, and/or	A9901		S13.4XXA	S23.3XXA	S33.5XXA		1	350.00

**Provider Information**

Provider Name: SIMONE HUBBARD  
License:  
Commercial PIN:  
SSN or EIN:

Total Charges: \$ 5600.00  
Total Payments: \$ 0.00  
Total Adjustments: \$ 0.00  
**Total Due This Visit: \$ 5600.00**  
Total Account Balance: \$ 5,600.00

Assign and Release: I hereby authorize payment of medical benefits to this physician for the services described above. I also authorize the release of any information necessary to process this claim.

Patient Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## COMPLETE FITNESS RHB LLC

**Patient Ledger**

Sorted By: Case Number

Entry	Date	POS	Description	Case	Procedure	Document	Provider	Amount
<b>GORDA000 DANIEL GORDON JR</b>								
			Last Payment: 0.00		On:			
43610	1/10/2024	11		385	97162	2401150000	AR	365.00
43611	1/10/2024	11		385	G0283	2401150000	AR	60.00
43612	1/10/2024	11		385	97035	2401150000	AR	70.00
43613	1/10/2024	11		385	97140	2401150000	AR	75.00
44089	1/18/2024	11		385	G0283	2401180000	AR	60.00
44090	1/18/2024	11		385	97110	2401180000	AR	90.00
44091	1/18/2024	11		385	97140	2401180000	AR	75.00
44092	1/18/2024	11		385	97112	2401180000	AR	65.00
44093	1/18/2024	11		385	97530	2401180000	AR	90.00
44094	1/18/2024	11		385	97039	2401180000	AR	5900.00
44311	1/19/2024	11		385	G0283	2401190000	AR	60.00
44312	1/19/2024	11		385	97035	2401190000	AR	70.00
44313	1/19/2024	11		385	97110	2401190000	AR	90.00
44314	1/19/2024	11		385	97140	2401190000	AR	75.00
44315	1/19/2024	11		385	97112	2401190000	AR	65.00
44316	1/19/2024	11		385	97530	2401190000	AR	90.00
44672	1/23/2024	11		385	G0283	2401230000	AR	60.00
44673	1/23/2024	11		385	97110	2401230000	AR	90.00
44674	1/23/2024	11		385	97140	2401230000	AR	75.00
44675	1/23/2024	11		385	97112	2401230000	AR	65.00
44676	1/23/2024	11		385	97530	2401230000	AR	90.00
44677	1/23/2024	11		385	97039	2401230000	AR	5900.00
45019	1/25/2024	11		385	G0283	2401250000	AR	60.00
45020	1/25/2024	11		385	97110	2401250000	AR	90.00
45021	1/25/2024	11		385	97140	2401250000	AR	75.00
45022	1/25/2024	11		385	97112	2401250000	AR	65.00
45023	1/25/2024	11		385	97530	2401250000	AR	90.00
45024	1/25/2024	11		385	97039	2401250000	AR	5900.00
45726	1/31/2024	11		385	97035	2401310000	AR	70.00
45727	1/31/2024	11		385	97110	2401310000	AR	90.00
45728	1/31/2024	11		385	97140	2401310000	AR	75.00
45729	1/31/2024	11		385	97112	2401310000	AR	65.00
45730	1/31/2024	11		385	97530	2401310000	AR	90.00
45731	1/31/2024	11		385	95999	2401310000	AR	4500.00
45732	1/31/2024	11		385	99199	2401310000	AR	1500.00
46211	2/1/2024	11		385	G0283	2402020000	AR	60.00
46212	2/1/2024	11		385	97110	2402020000	AR	90.00
46213	2/1/2024	11		385	97140	2402020000	AR	75.00
46214	2/1/2024	11		385	97112	2402020000	AR	65.00
46215	2/1/2024	11		385	97530	2402020000	AR	90.00
46216	2/1/2024	11		385	97039	2402020000	AR	5900.00
46492	2/6/2024	11		385	G0283	2402060000	AR	60.00
46493	2/6/2024	11		385	97110	2402060000	AR	90.00
46494	2/6/2024	11		385	97140	2402060000	AR	75.00
46495	2/6/2024	11		385	97112	2402060000	AR	65.00

## COMPLETE FITNESS RHB LLC

**Patient Ledger**

Sorted By: Case Number

Entry	Date	POS	Description	Case	Procedure	Document	Provider	Amount
46496	2/6/2024	11		385	97530	2402060000	AR	90.00
46497	2/6/2024	11		385	97039	2402060000	AR	5900.00
46872	2/8/2024	11		385	G0283	2402080000	AR	60.00
46873	2/8/2024	11		385	97110	2402080000	AR	90.00
46874	2/8/2024	11		385	97140	2402080000	AR	75.00
46875	2/8/2024	11		385	97112	2402080000	AR	65.00
46876	2/8/2024	11		385	97530	2402080000	AR	90.00
46877	2/8/2024	11		385	97039	2402080000	AR	5900.00
47397	2/13/2024	11		385	G0283	2402120000	AR	60.00
47398	2/13/2024	11		385	97110	2402120000	AR	90.00
47399	2/13/2024	11		385	97140	2402120000	AR	75.00
47400	2/13/2024	11		385	97112	2402120000	AR	65.00
47401	2/13/2024	11		385	97530	2402120000	AR	90.00
47402	2/13/2024	11		385	97039	2402120000	AR	5900.00
47910	2/15/2024	11		385	G0283	2402150000	AR	60.00
47911	2/15/2024	11		385	97110	2402150000	AR	90.00
47912	2/15/2024	11		385	97112	2402150000	AR	65.00
47913	2/15/2024	11		385	97140	2402150000	AR	75.00
47914	2/15/2024	11		385	97164	2402150000	AR	195.00
48361	2/20/2024	11		385	G0283	2402200000	AR	60.00
48362	2/20/2024	11		385	97035	2402200000	AR	70.00
48363	2/20/2024	11		385	97110	2402200000	AR	90.00
48364	2/20/2024	11		385	97140	2402200000	AR	75.00
48365	2/20/2024	11		385	97112	2402200000	AR	65.00
48366	2/20/2024	11		385	97530	2402200000	AR	90.00
48730	2/22/2024	11		385	G0283	2402220000	AR	60.00
48731	2/22/2024	11		385	97035	2402220000	AR	70.00
48732	2/22/2024	11		385	97110	2402220000	AR	90.00
48733	2/22/2024	11		385	97140	2402220000	AR	75.00
48734	2/22/2024	11		385	97112	2402220000	AR	65.00
48735	2/22/2024	11		385	97530	2402220000	AR	90.00
49336	2/27/2024	11		385	G0283	2402270000	AR	60.00
49337	2/27/2024	11		385	97110	2402270000	AR	90.00
49338	2/27/2024	11		385	97140	2402270000	AR	75.00
49339	2/27/2024	11		385	97112	2402270000	AR	65.00
49340	2/27/2024	11		385	97530	2402270000	AR	90.00
49341	2/27/2024	11		385	97039	2402270000	AR	5900.00
49822	3/1/2024	11		385	G0283	2403010000	AR	60.00
49823	3/1/2024	11		385	97035	2403010000	AR	70.00
49824	3/1/2024	11		385	97110	2403010000	AR	90.00
49825	3/1/2024	11		385	97140	2403010000	AR	75.00
49826	3/1/2024	11		385	97112	2403010000	AR	65.00
49827	3/1/2024	11		385	97530	2403010000	AR	90.00
50160	3/5/2024	11		385	G0283	2403050000	AR	60.00
50161	3/5/2024	11		385	97110	2403050000	AR	90.00
50162	3/5/2024	11		385	97140	2403050000	AR	75.00
50163	3/5/2024	11		385	97112	2403050000	AR	65.00

## COMPLETE FITNESS RHB LLC

**Patient Ledger**

Sorted By: Case Number

Entry	Date	POS	Description	Case	Procedure	Document	Provider	Amount
50164	3/5/2024	11		385	97530	2403050000	AR	90.00
50535	3/7/2024	11		385	G0283	2403070000	AR	60.00
50536	3/7/2024	11		385	97035	2403070000	AR	70.00
50537	3/7/2024	11		385	97110	2403070000	AR	90.00
50538	3/7/2024	11		385	97140	2403070000	AR	75.00
50539	3/7/2024	11		385	97112	2403070000	AR	65.00
50540	3/7/2024	11		385	97530	2403070000	AR	90.00
51011	3/12/2024	11		385	G0283	2403120000	AR	60.00
51012	3/12/2024	11		385	97035	2403120000	AR	70.00
51013	3/12/2024	11		385	97110	2403120000	AR	90.00
51014	3/12/2024	11		385	97140	2403120000	AR	75.00
51015	3/12/2024	11		385	97112	2403120000	AR	65.00
51016	3/12/2024	11		385	97530	2403120000	AR	90.00
51359	3/15/2024	11		385	G0283	2403180000	AR	60.00
51360	3/15/2024	11		385	97035	2403180000	AR	70.00
51361	3/15/2024	11		385	97110	2403180000	AR	90.00
51362	3/15/2024	11		385	97140	2403180000	AR	75.00
51363	3/15/2024	11		385	97112	2403180000	AR	65.00
51730	3/19/2024	11		385	G0283	2403190000	AR	60.00
51731	3/19/2024	11		385	97110	2403190000	AR	90.00
51732	3/19/2024	11		385	97140	2403190000	AR	75.00
51733	3/19/2024	11		385	97112	2403190000	AR	65.00
51734	3/19/2024	11		385	97530	2403190000	AR	90.00
52453	3/26/2024	11		385	G0283	2403260000	AR	60.00
52454	3/26/2024	11		385	97110	2403260000	AR	90.00
52455	3/26/2024	11		385	97140	2403260000	AR	75.00
52456	3/26/2024	11		385	97112	2403260000	AR	65.00
52457	3/26/2024	11		385	97530	2403260000	AR	90.00
52458	3/26/2024	11		385	97039	2403260000	AR	5900.00
52769	3/28/2024	11		385	G0283	2403280000	AR	60.00
52770	3/28/2024	11		385	97035	2403280000	AR	70.00
52771	3/28/2024	11		385	97110	2403280000	AR	90.00
52772	3/28/2024	11		385	97140	2403280000	AR	75.00
52773	3/28/2024	11		385	97112	2403280000	AR	65.00
52774	3/28/2024	11		385	97530	2403280000	AR	90.00
52875	3/29/2024	11		385	G0283	2403290000	AR	60.00
52876	3/29/2024	11		385	97110	2403290000	AR	90.00
52877	3/29/2024	11		385	97140	2403290000	AR	75.00
52878	3/29/2024	11		385	97112	2403290000	AR	65.00
52879	3/29/2024	11		385	97530	2403290000	AR	90.00
52880	3/29/2024	11		385	97039	2403290000	AR	5900.00
53268	4/2/2024	11		385	97140	2404020000	AR	75.00
53678	4/4/2024	11		385	G0283	2404040000	AR	60.00
53679	4/4/2024	11		385	97110	2404040000	AR	90.00
53680	4/4/2024	11		385	97140	2404040000	AR	75.00
53681	4/4/2024	11		385	97112	2404040000	AR	65.00
54838	4/15/2024	11		385	G0283	2404150000	AR	60.00

## COMPLETE FITNESS RHB LLC

**Patient Ledger**

Sorted By: Case Number

Entry	Date	POS	Description	Case	Procedure	Document	Provider	Amount
54839	4/15/2024	11		385	97035	2404150000	AR	70.00
54840	4/15/2024	11		385	97110	2404150000	AR	90.00
54841	4/15/2024	11		385	97140	2404150000	AR	75.00
54842	4/15/2024	11		385	97112	2404150000	AR	65.00
54843	4/15/2024	11		385	97530	2404150000	AR	90.00
54844	4/15/2024	11		385	97039	2404150000	AR	5900.00
55866	4/22/2024	11		385	G0283	2404290000	AR	60.00
55867	4/22/2024	11		385	97035	2404290000	AR	70.00
55868	4/22/2024	11		385	97110	2404290000	AR	90.00
55869	4/22/2024	11		385	97140	2404290000	AR	75.00
55870	4/22/2024	11		385	97112	2404290000	AR	65.00
55871	4/22/2024	11		385	97530	2404290000	AR	90.00
56078	4/29/2024	11		385	G0283	2404290000	AR	60.00
56079	4/29/2024	11		385	97035	2404290000	AR	70.00
56080	4/29/2024	11		385	97110	2404290000	AR	90.00
56081	4/29/2024	11		385	97140	2404290000	AR	75.00
56082	4/29/2024	11		385	97112	2404290000	AR	65.00
56083	4/29/2024	11		385	97530	2404290000	AR	90.00
57084	5/3/2024	11		385	G0283	2405030000	AR	60.00
57085	5/3/2024	11		385	97110	2405030000	AR	90.00
57086	5/3/2024	11		385	97140	2405030000	AR	75.00
57087	5/3/2024	11		385	97112	2405030000	AR	65.00
57088	5/3/2024	11		385	97530	2405030000	AR	90.00
57269	5/6/2024	11		385	G0283	2405060000	AR	60.00
57270	5/6/2024	11		385	97110	2405060000	AR	90.00
57271	5/6/2024	11		385	97140	2405060000	AR	75.00
57272	5/6/2024	11		385	97112	2405060000	AR	65.00
57273	5/6/2024	11		385	97530	2405060000	AR	90.00
58699	5/17/2024	11		385	G0283	2405170000	AR	60.00
58700	5/17/2024	11		385	97110	2405170000	AR	90.00
58701	5/17/2024	11		385	97140	2405170000	AR	75.00
58702	5/17/2024	11		385	97112	2405170000	AR	65.00
58703	5/17/2024	11		385	97530	2405170000	AR	90.00
60270	5/31/2024	11		385	G0283	2405300000	AR	60.00
60271	5/31/2024	11		385	97110	2405300000	AR	90.00
60272	5/31/2024	11		385	97140	2405300000	AR	75.00
60273	5/31/2024	11		385	97112	2405300000	AR	65.00
61160	6/10/2024	11		385	G0283	2406100000	AR	60.00
61161	6/10/2024	11		385	97110	2406100000	AR	90.00
61162	6/10/2024	11		385	97140	2406100000	AR	75.00
61163	6/10/2024	11		385	97112	2406100000	AR	65.00
63155	7/1/2024	11		385	G0283	2406280000	AR	60.00
63156	7/1/2024	11		385	97110	2406280000	AR	90.00
63157	7/1/2024	11		385	97140	2406280000	AR	75.00
63158	7/1/2024	11		385	97112	2406280000	AR	65.00
63590	7/5/2024	11		385	G0283	2407050000	AR	60.00
63591	7/5/2024	11		385	97110	2407050000	AR	90.00

## COMPLETE FITNESS RHB LLC

**Patient Ledger**

Sorted By: Case Number

Entry	Date	POS	Description	Case	Procedure	Document	Provider	Amount
63592	7/5/2024	11		385	97140	2407050000	AR	75.00
63593	7/5/2024	11		385	97112	2407050000	AR	65.00
63915	6/21/2024	11		385	G0283	2407100000	AR	60.00
63916	6/21/2024	11		385	97110	2407100000	AR	90.00
63917	6/21/2024	11		385	97112	2407100000	AR	65.00
63918	6/21/2024	11		385	97140	2407100000	AR	75.00
63919	6/21/2024	11		385	97164	2407100000	AR	195.00
65738	7/26/2024	11		385	G0283	2407260000	AR	60.00
65739	7/26/2024	11		385	97110	2407260000	AR	90.00
65740	7/26/2024	11		385	97140	2407260000	AR	75.00
65741	7/26/2024	11		385	97112	2407260000	AR	65.00
67208	8/9/2024	11		385	G0283	2408090000	AR	60.00
67209	8/9/2024	11		385	97110	2408090000	AR	90.00
67210	8/9/2024	11		385	97140	2408090000	AR	75.00
67211	8/9/2024	11		385	97112	2408090000	AR	65.00
69740	8/19/2024	11		385	G0283	2409030000	AR	60.00
69741	8/19/2024	11		385	97035	2409030000	AR	70.00
69742	8/19/2024	11		385	97110	2409030000	AR	90.00
69743	8/19/2024	11		385	97112	2409030000	AR	65.00
69744	8/19/2024	11		385	97140	2409030000	AR	75.00
69745	8/19/2024	11		385	97530	2409030000	AR	90.00
69746	8/19/2024	11		385	97164	2409030000	AR	195.00
70281	8/30/2024	11		385	G0283	2409110000	AR	60.00
70282	8/30/2024	11		385	97110	2409110000	AR	90.00
70283	8/30/2024	11		385	97140	2409110000	AR	75.00
70284	8/30/2024	11		385	97112	2409110000	AR	65.00
Patient Total								<u>\$86,430.00</u>